

Launch Final Rule Issue Clarification Record

1. Date:
January 16, 2003

2. Subgroup/FAA Person Seeking Clarification:
Flight Safety System/Michael Dook

3. Company/Industry Person Contacted:
Lockheed Martin/Sri Iyengar 303-977-3211

4. Issue:
Relief

5 Discussion:
<p>Mr. Iyengar was asked to elaborate on his concerns with the coordinated AF/FAA Relief process that was proposed in the SNPRM. The following summaries Mr. Iyengar's points made during the discussion:</p> <ol style="list-style-type: none">1. In general, the FAA is perceived by industry to be significantly more conservative than the AF. Whatever the process, the industry perceives that it will require greater effort on their part to obtain a formal decision from the FAA on any relief issue.2. The relief process described in the draft AF/FAA MOA concentrates on the FAA's participation in the relief process. Participation, such as sharing of data, participating in meetings, and providing input to the decision, is not the main concern.3. The main concern is the potential for two decisions by two agencies, including two signatures and possibly two sets of approval paperwork. The AF's and the FAA's.4. There is no need to change from the current approach just because of the new regulations. Under the current FAA requirements and approach, the FAA is free to participate and provide input to the AF's relief process. The FAA receives a copy of all AF approvals. There is no additional formal approval, signature, or paperwork required. If the FAA has an issue the FAA is free to raise it and ensure that it is resolved. This current approach provides for safety and is appropriate for launches from an AF range. The current approach has worked well and would continue to work well under the new rule.

6. Conclusion:
Mr. Iyengar's input has been added to the public record and is being taken into consideration as the FAA continues development of the proposed rule.